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March 5, 2012

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte
WC Docket Nos. 10-90, 07-135, 05-337, 03-109
CC Docket Nos. 01-92, 96-45
GN Docket No. 09-51

Dear Ms. Dortch:

On Thursday, March 1, 2012, representatives of Central Texas Telephone Cooperative, Inc. ("Central Texas") including Jamey Wigley, General Manager of Central Texas and Clay Sturgis of Moss Adams via teleconference, met with Amy Bender, Patrick Halley, Rodger Woock, Gary Seigel, James Eisner, Katie King, Craig Stroup, and Wesley Platt of the Federal Communications Commission's ("FCC" or "Commission") Wireline Competition Bureau to further discuss the results of the FCC's proposed regression analysis model¹ on Central Texas. The undersigned counsel for Central Texas met in-person with the FCC.

In the meeting, Central Texas provided the Commission with maps and photographs (attached) demonstrating the rocky terrain, cliffs, and other factors that have a direct effect on Central Texas's network costs. Central Texas discussed the costs and challenges associated with upgrading its network to meet the FCC's broadband standards. Central Texas provided a detailed explanation of the prudence of its past expenses and the need for further upgrades to provide broadband services not only to its end-user customers, but also to provide transport and vital broadband connections to the PSTN for multiple wireless carriers, university networks, businesses, the oil industry, and state and federal entities.

Central Texas requested that the Commission release what changes, if any, it has made and plans to make to the regression model and seek further comment on these proposed changes. Central Texas noted that the regression model, as currently proposed, has been shown as

¹ Notice Concerning Universal Service Inter-carrier-Compensation Transformation Proceeding, Public Notice, DA 11-1966 (December 2, 2011).

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seriously flawed and that the record does not support adoption of the current model. Central Texas expressed the need for the FCC to “get it right” before likely using the model for other high-cost cap purposes. Central Texas noted that the FCC would be on more secure legal ground if it slowed down, released any new data it has developed, and sought further comment on the regression model, rather than issuing an Order with a changed model where industry input on the changes was absent.²

Should you have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Kenneth C. Johnson

Kenneth C. Johnson

Attachments

cc (via email): Amy Bender
Patrick Halley
Rodger Woock
Gary Seigel
James Eisner
Katie King
Craig Stroup
Wesley Platt

² See *Amer. Radio Relay League v. FCC*, 524 F.3d 227, 237 (D.C. Cir. 2008) citing *Nat’l Ass’n of Regulatory Util. Comm’rs v. FCC*, 737 F.2d 1095, 1121 (D.C. Cir. 1984) (casting significant doubt upon the FCC’s use of “a complex mix of controversial and uncommented upon data and calculations.”)

Central Texas Telephone Coop.

Naturalization & Immigration Circuit (Border Patrol)

Angelo State University
Fiber Link

HWY 87 TO SAN ANGELO

HWY 87 TO SAN ANGELO

**Fiber Route for Angelo State University
Department of Information Resources Data
Center:**

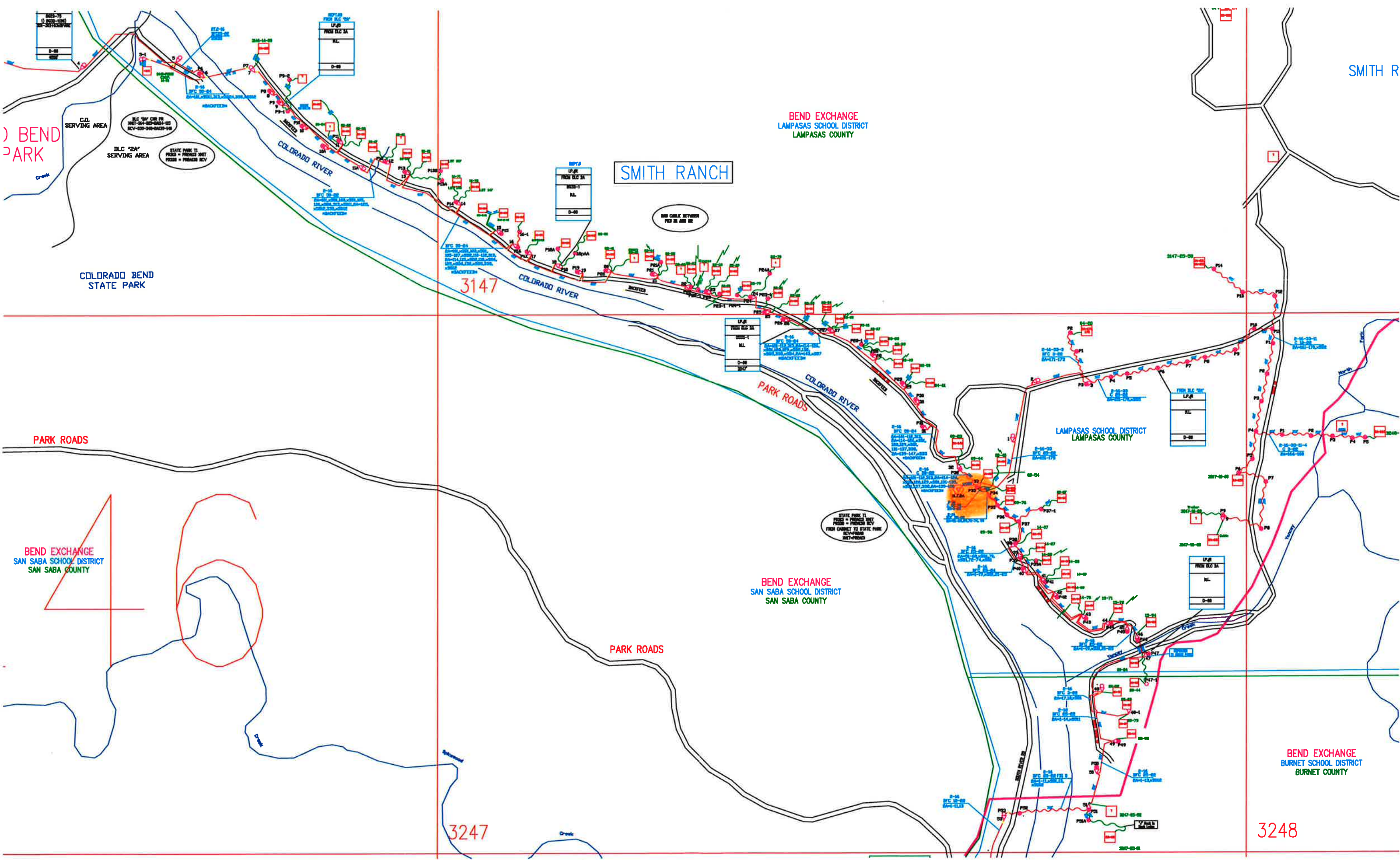
- State of Texas Dept. of Information Resources
- West Texas Disaster Recovery Center
- Lone Star Education & Research Network
- Link between Cannon AFB-Clovis, NM to Goodfellow AFB-San Angelo, TX
- Link Between Cannon AFB-Clovis, NM to Kelley AFB-San Antonio, TX

- 18 - Cell Towers - Represented by
- 13 - United States Post Offices
- 10 - School Districts
- 2 - LCRA - Power Plant Monitoring & Weather Monitoring
- 3 - Pipeline Monitors (Seminole & Sunoco)
- 2 - Texas Lone Star Network Hubs
 - Hill Country Transit Admin. Office- a Public Transportation System that is a Political Subdivision of the State of Texas
 - National Weather Service Station
 - Texas Dept Of Criminal Justice Center- Mens Medium Security Prison
 - Texas Dept Of Transportation Center
 - Texas Game Warden Training Facility (only Game Warden Training Facility in Texas)
 - T1 line for Lockheed Martin
 - State Park- Colorado Bend
 - 100% DSL Availability









) BEND
PARK

COLORADO BEND
STATE PARK

SMITH RANCH

SMITH R

3147

PARK ROADS

BEND EXCHANGE
SAN SABA SCHOOL DISTRICT
SAN SABA COUNTY

BEND EXCHANGE
SAN SABA SCHOOL DISTRICT
SAN SABA COUNTY

PARK ROADS

3247

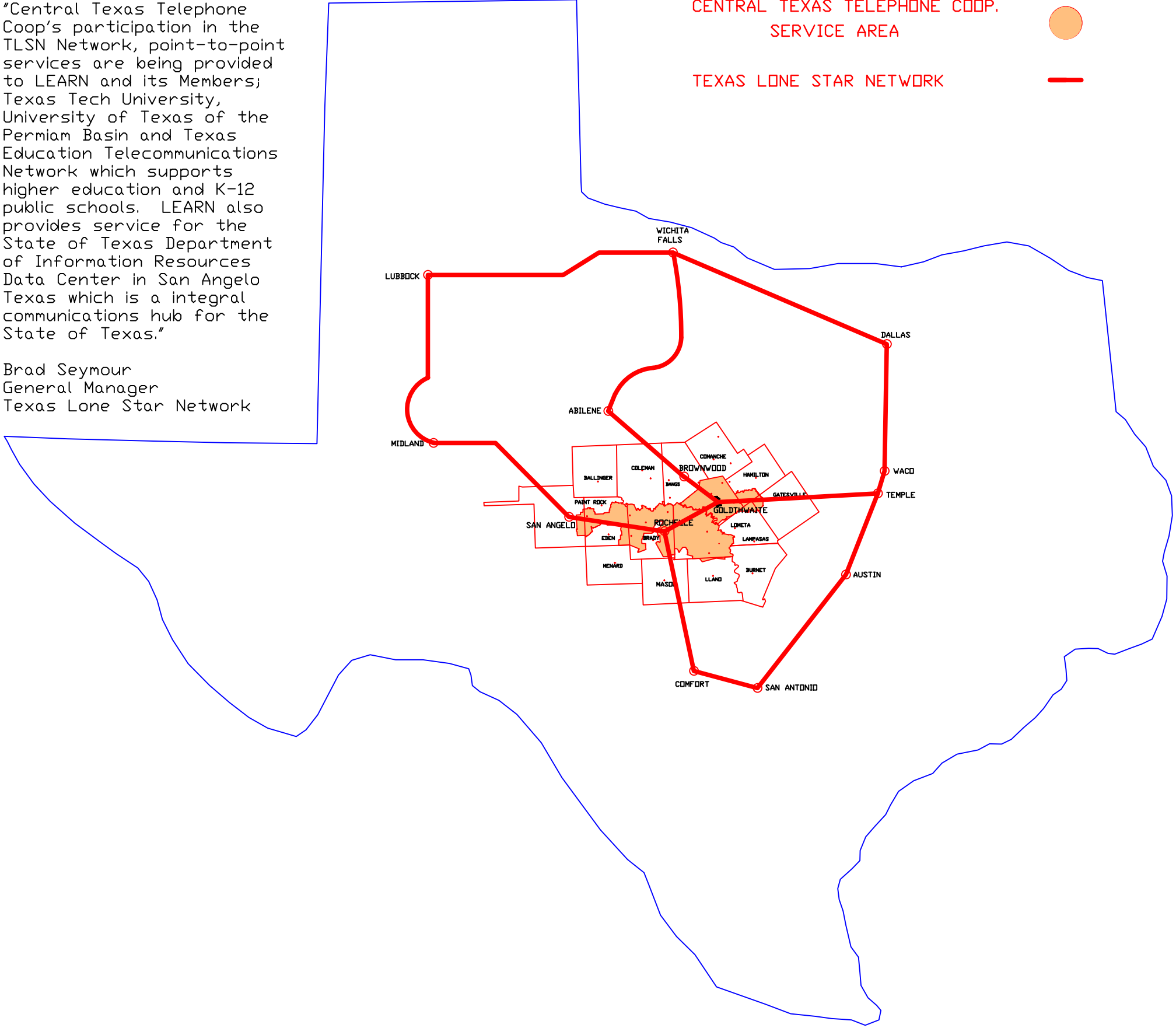
LAMPASAS SCHOOL DISTRICT
LAMPASAS COUNTY

BEND EXCHANGE
BURNET SCHOOL DISTRICT
BURNET COUNTY

3248

"Central Texas Telephone Coop's participation in the TLSN Network, point-to-point services are being provided to LEARN and its Members; Texas Tech University, University of Texas of the Permian Basin and Texas Education Telecommunications Network which supports higher education and K-12 public schools. LEARN also provides service for the State of Texas Department of Information Resources Data Center in San Angelo Texas which is a integral communications hub for the State of Texas."

Brad Seymour
General Manager
Texas Lone Star Network



CENTRAL TEXAS TELEPHONE CO-OP INC.
GOLDTHWAITE, TEXAS

WASHINGTON D.C. AREA
68.3 Sq. Miles, 2011 Population 617,996

